

ALLEN & OVERY LLP

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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

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In re: :
: Chapter 15
SINO-FOREST CORPORATION, :
: Case No. 13-10361 (MG)
:
Debtor in a Foreign Proceeding. :
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**NOTICE OF FILING OF ORDER OF QUEBEC COURT PERMANENTLY
STAYING CLASS ACTION AGAINST ERNST & YOUNG LLP**

PLEASE TAKE NOTICE that Ernst & Young LLP (“**E&Y**”) hereby files, in the above captioned case, a copy of the *Order on the Petitioner’s Motion De Bene Esse to Stay the Motion to Authorize the Bringing of a Class Action and to Obtain the Status of Representative as Against Ernst & Young* (the “**Order**”) of the Quebec Superior Court (the “**Quebec Court**”), dated October 29, 2013. The Order declares that, upon the “Ernst & Young Settlement Date,” as defined in the Settlement Order of the Ontario Superior Court of Justice (the “**Ontario Court**”) dated March 23, 2013, the class action proceeding commenced in the Quebec Court against Sino-Forest Corporation (“**SFC**”), E&Y, and others shall be permanently stayed, estopped, and barred as against E&Y pursuant to the Plan of Compromise and Arrangement of SFC and the order of the Ontario Court sanctioning such Plan. A copy of the Order is attached hereto as **Exhibit A**.

Dated: New York, New York
November 12, 2013

ALLEN & OVERY LLP

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EXHIBIT A